

## REMARKS

This application has been carefully reconsidered in view of the Office Action of November 6, 2003. By this amendment, new dependent claims 12-16 are presented along with new independent claim 17 and claims 18-22, dependent from claim 17. New independent claim 17 is similar to original claim 11, but adds the additional requirement that the preliminary reactor has a different configuration than the configuration of the preliminary reactor. New claim 17 is submitted to be patentable over the patent to Platz for the same reasons as advanced below with respect to claim 11. In addition, claim 17 distinguishes over Platz because of the difference between the preliminary and main reactors as now specifically set forth in claim 17. The Examiner will recognize that the patent to Platz does not disclose a preliminary reactor and a main reactor as claimed, but simply two main reactors of identical configuration connected in series.

The rejection of claim 11 under 35 U.S.C. §102 as anticipated by Platz is respectfully traversed. It is noted that claim 11, in calling for a preliminary reactor which is connected to a second inlet of the main reactor, specifies a respective outlet for releasing waste gases from the preliminary reactor. The patent to Platz fails to disclose an apparatus comprising a preliminary reactor and a main reactor with a recited outlet for releasing waste gases from the preliminary reactor. With respect to the comments found in paragraph 3 of the Office Action regarding outlet 24 of the Platz reactor, it is noted that this outlet does not release gases of any nature from the reactor 10, but instead directs unreacted polymerizable gas from the top of the reactor through a cyclone 26 to the bottom of reactor 10 through line 28. There is no outlet for releasing waste gases or even unreacted monomer from the reactor and to attempt to modify the Platz system to release such gases from the reactor 10 would clearly be directly contrary to the

teachings of the patentee. In fact, since the line 28 in Platz serves as a vehicle for monomer introduced through the feed supply line 34, to attempt to divert line 28 away from the reactor would appear to render the Platz system inoperative for its intended purpose. In any case, there clearly is no disclosure or even the remotest suggestion in the reference of releasing gases in line 24 from the preliminary reactor. The reference discloses the exact opposite.

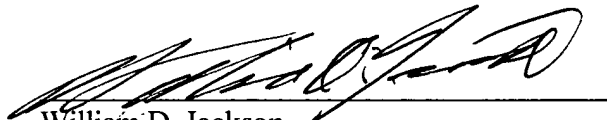
Dependent claims 12-16 are patentable over the patent to Platz for the same reasons as advanced above with respect to parent claim 11. In addition, claim 12 recites that the main reactor is arranged to be operable as a liquid phase reactor and claim 13 specifies that the main reactor is a loop-type reactor, thus further distinguishing over the reference. Claim 14 is further directed to the embodiment of applicant's invention in which two main reactors are connected in series. The patent to Platz clearly does not disclose a combination of a preliminary reactor, and in addition, two main reactors connected in series. Claims 15 and 16 recite that each of the series connected main reactors are arranged to operate in the liquid phase and further specify, in claim 17, that they are both loop-type reactors. The reactor configurations called for in claims 15 and 16 clearly are not disclosed or even remotely suggested in the Platz reference.

Claim 17, as discussed previously, calls for the preliminary reactor to be of a different configuration than the main reactor and in addition, calls for the preliminary reactor outlet for releasing waste gases as discussed previously. Platz, of course, discloses two reactors of identical configuration and as discussed above with respect to claim 11, fails to disclose an outlet for releasing waste gases from a preliminary reactor. Claims 18-22 depend from independent claim 17 and further distinguish over the prior art for the reasons advanced above with respect to dependent claims 12-16.

For the reasons advanced above, it is respectfully submitted that all of the claims now pending in this application are patentable over the prior art. Accordingly, an early reconsideration and allowance of this application is respectfully requested.

The Commissioner is authorized to charge any fee required in connection with the submission of this document to the Locke Liddell & Sapp LLP deposit account no. 12-1781.

Respectfully submitted,

  
William D. Jackson  
Registration No. 20,846

Date: January 7, 2004  
Locke Liddell & Sapp LLP  
2200 Ross Avenue, Suite 2200  
Dallas, TX 75201-6776  
Telephone: (214) 740-8535  
Facsimile: (214) 756-8535